

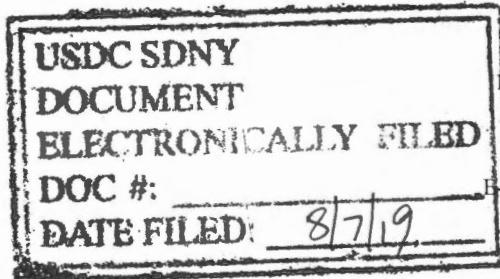
SAPONE & PETRILLO, LLP

William S. Petrillo, Esq., Partner  
Edward V. Sapone, Esq., Partner

MANHATTAN  
1 Penn Plaza, Suite 5315  
New York, New York 10119  
Telephone: (212) 349-9000  
Facsimile: (212) 349-9003  
E-mail: ed@saponepetrillo.com

Chase S. Ruddy, Esq., Senior Associate

LONG ISLAND  
103 Stewart Avenue, Suite 200  
Garden City, New York 11530  
Telephone: (516) 678-2800  
Facsimile: (516) 977-1977  
E-mail: william@saponepetrillo.com



August 7, 2019

Hon. Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *United States v. Kalkanis, et al.*  
18-CR-289 (SHS)

Dear Judge Stein:

I am retained counsel to Defendant Peter Kalkanis in the above-referenced case. I write to respectfully request that Mr. Kalkanis' conditions of release be modified to permit him to travel to the District of New Jersey tomorrow, August 8, 2019, so that he may pick up his niece at Newark Airport when her flight lands at approximately 9:00 p.m. Your Honor had previously modified Mr. Kalkanis' conditions so that he could drop his niece off at the airport when she departed on July 21.

By way of background, on April 19, 2018, Mr. Kalkanis made his initial appearance in front of the Hon. Stewart D. Aaron. On that date, he was released on a \$250,000 personal recognizance bond, secured by the signatures of three financially responsible people. His travel was restricted to the Southern and Eastern districts of New York and the Eastern District of Pennsylvania. On May 11, 2018, Judge Swain also permitted Mr. Kalkanis to travel to the District of Connecticut for work. He has been compliant with all of the terms of his release.

I have spoken to Pretrial Services by Officer Erin Cunningham, and the Government by A.U.S.A. Alexandra Rothman, and neither object to this request.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone  
Edward V. Sapone

cc: A.U.S.A. Alexandra Rothman  
P.S.O. Erin Cunningham

SO ORDERED 8/7/19

SIDNEY H. STEIN  
U.S.D.J.